

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

| | | |
|--|---------------|-------------------------|
| UNITED STATES OF AMERICA | : | |
| | : | |
| v. | : | Civil Action No. |
| | : | |
| Assorted Jewelry (VL: \$12,300) and | : | |
| One Mont Blanc Starwalker Ballpoint | : | |
| Pen | : | |
| | : : : : : : : | |

VERIFIED COMPLAINT FOR FORFEITURE

Plaintiff, United States of America, by its attorneys, Rod Rosenstein, United States Attorney for the District of Maryland, and Arun G. Rao, Assistant U.S. Attorney, brings this complaint and alleges as follows in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

NATURE OF THE ACTION

1. This is a civil forfeiture action against U.S. currency involved in violations of the Controlled Substances Act that is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6).

THE DEFENDANTS IN REM

2. The defendant property consists of Assorted Jewelry (VL: \$12,300) and One Mont Blanc Starwalker Ballpoint Pen (VL: \$600), hereinafter referred to as “defendant property.”

3. On or about September 13, 2013, the defendant property was seized from Michael Revel and Salecia Hines, at 9606 Middleridge Court, Brandywine, Prince George’s County, pursuant to the execution of a search and seizure warrant in the State and District of Maryland.

4. Since seizure, the defendant property has been and presently is in the custody of the United States Marshal Service.

JURISDICTION AND VENUE

5. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the defendant property. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, over an action for forfeiture under 28 U.S.C. § 1355(a), and over this particular action under 21 U.S.C. §881(a)(6).

6. This Court has *in rem* jurisdiction over the defendant property under 28 U.S.C. § 1355(b).

7. Venue is proper in this district pursuant to 28 U.S.C. §1355(b)(1), because the acts or omissions giving rise to the forfeiture occurred in this district and pursuant to 28 U.S.C. §1395 because the property is located in this district.

BASIS FOR FORFEITURE

8. The defendant property is subject to forfeiture pursuant to 21 U.S.C. §881(a)(6) because it is proceeds or was derived from proceeds furnished and intended to be furnished in exchange for a controlled substance in violation of the Controlled Substances Act, constituted proceeds traceable to such an exchange, and was used and intended to be used to facilitate such violation.

FACTS

9. The forfeiture is based upon, but not limited to, the evidence outlined in the attached Declaration of Special Agent Heath Anderson, Drug Enforcement Administration, which is incorporated herein by reference.

WHEREFORE, the plaintiff prays that all persons who reasonably appear to be potential claimants with interests in the defendant property be cited to appear herein and answer the complaint; that a Warrant of Arrest *in rem* be issued to the U.S. Marshal Service commanding the arrest of the defendant property; that the defendant property be forfeited and condemned to the United States of America; that upon Final Decree of Forfeiture, the United States Marshal

dispose of the defendant property according to law; and that the plaintiff have such other and further relief as this Court deems proper and just.

Respectfully submitted,

Rod J. Rosenstein
United States Attorney


By: 

Arun G. Rao
Assistant United States Attorney
36 South Charles Street
Fourth Floor
Baltimore, Maryland 21201
(410) 209-4800

VERIFICATION

I, Arun G. Rao, declare under penalty of perjury as provided by 28 U.S.C. §1746, that the foregoing Complaint for Forfeiture is based on reports and information furnished to me by the ~~Federal Bureau of Investigation~~ Drug Enforcement Administration, and that everything contained therein is true and correct to the best of my knowledge and belief.

2/12/14
Date


Arun G. Rao
Assistant United States Attorney

DECLARATION

This affidavit is submitted in support of a complaint for forfeiture of assorted jewelry, valued at \$12,300, and One Mont Blanc Starwalker ballpoint pen, valued at \$600.

I, Heath Anderson, Special Agent of the Drug Enforcement Administration, submit that there are sufficient facts to support a reasonable belief that the above-mentioned seized property was purchased from drug proceeds.

- a. On September 13, 2013, at approximately 11:45 a.m., members of PGPD EST and DEA WDO Group 46 and 48 executed a federal search warrant at 9606 Middleridge Ct., Brandywine, Maryland. There was no one present in the residence when the warrant was executed and officers had to make a forceful entry after knocking and announcing. When the residence was cleared, members of law enforcement conducted a search of the residence in accordance with the warrant. The below listed items were seized from the residence.
- b. A copy of the search warrant and return were left on the dining room table.

DRUG EVIDENCE

- c. Exhibit-300 is described as follows: a plastic cup containing a white powder, a black mirror with a white powder on it, a small scale with a white powder on it, a small black grinder with white powder on it, white small box containing straws with white powder on them. The exhibit was located by TFO Peters, SA Anderson seized the exhibit and transported to the Greenbelt HIDTA office where it was later processed as evidence. The exhibit was stored at the Greenbelt HIDTA pending its transfer to the MARL on the date reflected on the DEA-7.
- d. Exhibit-301 is described as follows: a mason jar containing buds, misc. bags and baggies covered in a green leafy material, a plastic container with a green leafy material, loose green leafy material, and other drug related paraphernalia. The exhibit was located by TFO Peters, SA Anderson seized the exhibit and transported to the Greenbelt HIDTA office where it was later processed as evidence. The exhibit was stored at the Greenbelt HIDTA pending its transfer to the MARL on the date reflected on the DEA-7.

NON-DRUG EVIDENCE

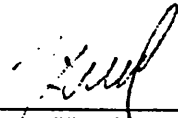
- e. Exhibit N-300 is described as follows: Misc. documents two(2) BB&T bank letters addressed to Michael Revel at 9606 Middleridge Ct., Brandywine, Maryland. The exhibit was located and seized by S/A Anderson who subsequently transported the exhibit back to the Greenbelt HIDTA office where he processed it as evidence as witnessed by SA Gray. The exhibits were placed in temporary storage pending transfer to the WDO/NDEC for safekeeping.

- f. Exhibits N-301 described as one apple iPhone Cellular Telephone (Ser# 83026JL3A4S) seized from the trunk of a white Lexus located in the garage of 9606 Middleridge Ct., Brandywine, MD. The exhibit was located by SA Stephanie Johnson on September 13, 2013. SA Anderson subsequently seized and transported the exhibit back to the Greenbelt HIDTA office where he processed it as evidence as witnessed by SA Gray. The exhibits were placed in temporary storage pending transfer to the WDO/NDEC for safekeeping.
- g. Exhibit N-302 is described as a Glock 40 Cal. handgun bearing ser# LXW366. The exhibit was located on the floor of the master bedroom closet by TFO Peters, SA Anderson seized the exhibit and transported it to the Greenbelt HIDTA office where it was later processed as evidence and secured. The exhibits were placed in temporary storage pending transfer to the WDO/NDEC for safekeeping.
- h. Exhibit N-303 is described as a Glock 9mm Cal. handgun bearing ser# LTG711. The exhibit was located in a gun case on the floor of the master bedroom closet by TFO Peters, SA Anderson seized the exhibit and transported it to the Greenbelt HIDTA office where it was later processed as evidence and secured. The exhibits were placed in temporary storage pending transfer to the WDO/NDEC for safekeeping.
- i. Exhibit N-304 is described as a S&W 357 Magnum Revolver handgun bearing ser# CCH6352. The exhibit was located in a gun case on the floor of the master bedroom beside a dresser by TFO Peters, SA Anderson seized the exhibit and transported to the Greenbelt HIDTA office where it was later processed as evidence and secured. The exhibits were placed in temporary storage pending transfer to the WDO/NDEC for safekeeping.
- j. Exhibit N-305 is described as jewelry located in REVEL's master bedroom and closet. N-305 was seized by S/A Anderson who transported the exhibit back to the Greenbelt HIDTA office where it was placed into the vault for safekeeping. On September 17, 2013, SA Miller removed the exhibit from the Safe as witnessed by GS Murphy. The exhibit was transported to Edward Arthur Jewelers, Inc. at 2825 Columbia Mall, Columbia, MD. The exhibit was turned over to the business. On 9/24/2013, S/A Miller picked up the appraised jewelry and returned it to the Greenbelt HIDTA office for temporary storage. Subsequently, the jewelry was turned over to the High Value Evidence Custodian at the WDO.
- k. Exhibit N-305a consist of the original evidence bag containing N-305. This exhibit was processed as detailed on the DEA-7a.
- l. Exhibit N-306 is described as a marijuana smoking device by Storz and Bickel (drug paraphernalia) contained in a black case. The exhibit was located on the floor in the basement entertainment room by DET. Simmons (PGPD), SA Anderson seized the exhibit and transported to the Greenbelt HIDTA office

where it was later processed as evidence and secured. The exhibits were placed in temporary storage pending transfer to the WDO/NDEC for safekeeping.

- m. Exhibit N-307, the Mont Blanc pen, was seized from the dining room area
- n. During an interview with REVEL he stated to S/A Anderson and S/A Gray that he did sell small amounts of narcotics.
- o. Based on the drug -related items seized above, it is clear that REVEL had these items for the distribution of narcotics.

I DECLARE UNDER PENALTY OF PERJURY PURSUANT TO TITLE 28 U.S.C. 1746 THAT THE FACTS SUBMITTED BY THE MARYLAND STATE POLICE, IN REFERENCE TO THE SEIZURE OF MISCELLANEOUS JEWELRY ARE ACCURATE, TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.



Heath Anderson
Special Agent
Drug Enforcement Administration

MEMORANDUM

DATE: February 10, 2014

TO: Kristine Cupp
U.S. Marshal Service

FROM: Naquita C. Ervin
FSA Paralegal Specialist
U.S. Attorney's Office - District of Maryland

RE: **U.S. v. Assorted Jewelry (VL: \$12,300) and One Mont Blanc
Starwalker Ballpoint Pen**

Civil Action No.

CATS ID 13-DEA-589334, 13-DEA-589337 – GD-13-0192

The United States has filed a forfeiture action against **Assorted Jewelry (VL: \$12,300) and One Mont Blanc Starwalker Ballpoint Pen**. A copy of the Complaint for Forfeiture is attached.

Notice of this seizure will be published at www.forfeiture.gov pursuant to Rule G of the Supplemental Rules for Admiralty or Maritime and Asset Forfeiture Claims.

Thank you.

Attachment

| | |
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| PLAINTIFF UNITED STATES OF AMERICA | COURT CASE NUMBER |
| DEFENDANT Assorted Jewelry (VL: \$12,300) and One Mont Blanc Starwalker Ballpoint Pen (VL: \$600) | TYPE OF PROCESS Verified Complaint in Rem |

| | |
|------------------|--|
| SERVE ↓ AT | NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN 13-DEA-589334, 13-DEA-589337/ GD-13-0192 |
| | |
| | ADDRESS (Street or RFD, Apartment No., City, State, and ZIP Code) |

| | | |
|--|---|--|
| SEND NOTICE OF SERVICE TO REQUESTER AT NAME AND ADDRESS BELOW: | Number of process to be served with this Form - 285 | |
| Naquita C. Ervin, FSA Paralegal Specialist U.S. Attorney's Office 36 S. Charles Street, 4th floor Baltimore, Maryland 21201 | Number of parties to be served in this case | |
| | Check for service on U.S.A. | |

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Address, All Telephone Numbers, and Estimated Times Available For Service)

Arrest property. Fill in the date of arrest in this process receipt and return our copy.

| | | |
|--|----------------------------------|-----------------|
| Signature of Attorney or other Originator requesting service on behalf of: | TELEPHONE NUMBER 410-209-4800 | DATE 2/10/14 |
|--|----------------------------------|-----------------|

| SPACE BELOW FOR USE OF U.S. MARSHAL ONLY - DO NOT WRITE BELOW THIS LINE | | | | | |
|---|----------------------------|---------------------------------|--------------------------------|---|---------------|
| I acknowledge receipt for the total number of process indicated. (Sign only first USM 285 if more than one USM 285 is submitted) | Total Process No. _____ | District of Origin No. _____ | District to Serve No. _____ | Signature of Authorized USMS Deputy or Clerk _____ | Date _____ |

I hereby certify and return that I ☐ have personally served, ☐ have legal evidence of service, ☐ have executed as shown in "Remarks", the process described on the individual, company, corporation, etc. at the address shown above or on the individual, company, corporation, etc., shown at the address inserted below.

☐ I hereby certify and return that I am unable to locate the individual, company, corporation, etc., named above (See remarks below).

| | |
|---|---|
| Name and title of individual served (If not shown above). | <input type="checkbox"/> A person of suitable age and discretion then residing in the defendant's usual place of abode. |
| Address (complete only if different than shown above) | |
| | <div>Date of Service</div> <div>Time am pm</div> |
| | Signature of U.S. Marshal or Deputy |

| | | | | | | |
|-------------|---|----------------|---------------|------------------|------------------------------|------------------|
| Service Fee | Total Mileage Charges (including endeavors) | Forwarding Fee | Total Charges | Advance Deposits | Amount Owed to US Marshal or | Amount or Refund |
|-------------|---|----------------|---------------|------------------|------------------------------|------------------|

REMARKS:

PRIOR EDITIONS MAY BE USED SEND ORIGINAL + 2 COPIES to USMS.

1. CLERK OF COURT 2. USMS Record 3. Notice of Service 4. Billing Statement 5. Acknowledgment of Receipt